

13cv2839 JMG/FW

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.:

DALE MONTGOMERY

Plaintiff,

COMPLAINT

v.

WITH JURY TRIAL

Pinnacle Credit Services et al

DEMAND

MOTION FOR ENTRY OF DEFAULT JUDGEMENT

TO THE HONORABLE JUDGE OF THIS COURT.

The plaintiff Dale Montgomery, comes before this court with this Motion for Entry of Default Judgment against Equable Ascent Financial, and states as follows:

1. I am the Prose Plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter. Plaintiff has made all filings required by this court to bring a cause of action against the Defendant Equable Ascent Financial, for damages under the FCRA 15 USC 1681 et seg, ,Telephone Consumer Practices ACT47 U.S.C. §227(b)(3)(A), FDCPA), 15 U.S.C. §1692, MFDCPA 332.33-355- 332.37
2. Plaintiff has made proper service of the summons and complaint to the defendant as Equable Ascent Financial evidenced by the proof of mailing.
3. The time for the defendant to respond is past and there has been no response to the service of summons and complaint in this matter and defendant is therefore in default.

SCANNED

NOV 22 2013

U.S. DISTRICT COURT ST. PAUL

[Signature]

RECEIVED
NOV 22 2013
CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

4. Plaintiff has made a request for Clerks entry of default judgment and it was granted on November 21, 2013.

Wherefore, the Plaintiff respectfully moves the court to enter an order of default judgment against the defendant, Equable Ascent Financial in the amount of \$6200.00 for statutory damages as well as the cost to bring this action as stated in the annexed bill of cost and for which let execution issue.

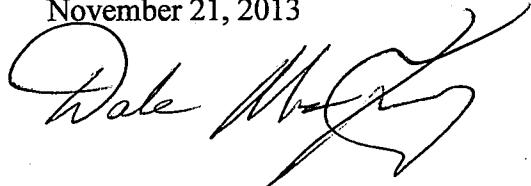
Respectfully Submitted

Dale Montgomery

12131 Paris Ave N

Stillwater, MN 55082

November 21, 2013

A handwritten signature in black ink, appearing to read "Dale Montgomery".

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**STATEMENT OF COST INCURRED BY PLAINTIFF
FOR Equable Ascent Financial**

| | |
|---|---|
| CLERKS FEE FOR FILING COMPLAINT | \$400.00 Divided by 4 Defendants = \$100.00 |
| COST OSF SERVICE OF SUMMONS AND COMPLAINT | \$ 14.00 |
| TOTAL COST INCURRED | \$114.00 |

Respectfully Submitted

Dale Montgomery

12131 Paris Ave N

Stillwater, MN 55082

